



PEÑASCO VALLEY TELEPHONE
COOPERATIVE, INC.

April 12, 2002

Ms. Magalie Roman Salas, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

**Re: CC Docket No. 94-102 / Quarterly TTY Implementation Report
Broadband PCS Stations KNLH424, KNLG212, KNL775 and KNL768
BTA068 F – Carlsbad, NM
BTA068 E – Carlsbad, NM
BTA386 C1 – Roswell, NM
BTA191C1 – Hobbs, NM**

Dear Ms. Salas:

PVT Wireless Limited Partnership ("PVT") hereby submits its April 2002 quarterly report on implementation of TTY access to 9-1-1 over its digital wireless network, pursuant to the Commission's *Fourth Report and Order* in CC Docket No. 94-102.¹

PVT has launched its service on the Carlsbad E-Block and Roswell C1-Block using Nortel CDMA equipment, and has configured these systems to operate in conjunction with the Sprint PCS network. PVT is currently planning to abide by the TTY technical standards and solutions adopted by Sprint PCS. In this regard, it is PVT's understanding that Sprint's testing of the Nortel digital TTY solution has been successful, and that they have begun TTY implementation in all of their Nortel markets. We understand that Sprint PCS will be providing further details about their TTY deployment and testing activities through the TTY Forum. PVT is a small rural carrier, and we do not have the resources to participate in beta testing of network software and infrastructure equipment. PVT will make every effort to implement TTY capability in these markets by the June 30, 2002 deadline.

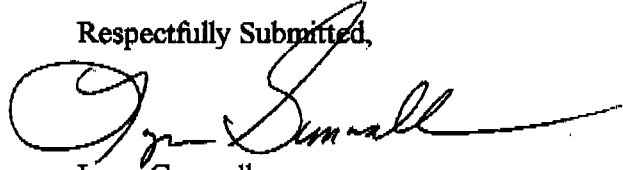
In PVT's previous quarterly report, dated December 28, 2001, we noted that, despite our best efforts, we were unable to meet the December 31, 2001 deadline by which carriers operating digital wireless systems should have obtained all software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices, as specified in the

¹ In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Fourth Report and Order*, CC Docket 94-102, 15 FCC Rcd 25216 (December 28, 2000), ("Fourth Report and Order").

Fourth Report and Order. Therefore, we requested a waiver of the December 31, 2001 requirement, to the extent deemed necessary by the Commission.

With regard to the Hobbs C1-Block system, PVT has previously notified the Commission that its digital wireless network in this market was constructed using the UT Starcom Personal Access System and it is compliant with the Commission's TTY access requirements.² The Carlsbad F-Block system was also recently constructed using UT Starcom technology, so it too is compliant.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Lynn Gunwall", with a long, sweeping horizontal line extending to the right.

Lynn Gunwall
Vice President Subsidiary Operations
PVT NetWorks, Inc.
Peñasco Valley Telephone Cooperative, Inc.

² See Third Quarterly TTY Implementation Report of PVT Wireless Limited Partnership, filed October 15, 2001.

**PVT Wireless Limited Partnership
E911 TTY Device Capability Report for April, 2002**

I. DEVELOPMENT ACTIVITIES

- 1) **Network Infrastructure Software Development** – PVT Wireless Limited Partnership (“PVT”) has launched its service on the Carlsbad E-Block and Roswell C1-Block using Nortel CDMA equipment, and has configured these systems to operate in conjunction with the Sprint PCS network. PVT is currently planning to abide by the TTY technical standards and solutions adopted by Sprint PCS. In this regard, it is PVT’s understanding that Sprint’s testing of the Nortel digital TTY solution has been successful, and that they have begun TTY implementation in all of their Nortel markets. We understand that Sprint PCS will be providing further details about their TTY deployment and testing activities through the TTY Forum.

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- 2) **Handset Development and Testing Plans** – We are following the CDMA handset development and interoperability testing that is being performed by Sprint PCS. We are working with our suppliers to acquire these units as soon as possible.

UTStarcom has tested its Personal Access System with the Ameriphone Model Q.90 and the Ultratec Ezcom PRO TTY models. These units were tested into the UTS702P mobile handset, the UTS708J handset, and the UTS800 Fixed Access Unit. In all cases, the TTY performed as if connected to a wired telephone line, though handover performance with the UTS702P resulted in loss of connectivity during the handover interval or about one second. This performance is consistent with the handover operation for voice calls and is not at all unique to TTY operation. All features, including the VCO and HCO operation of the Ameriphone Q.90 operated as expected from a wire line phone.

- 3) **Beta Testing and Lab Testing** – PVT is a small carrier, and is looking to its equipment manufacturers to conduct full beta and lab testing of network software, handsets and infrastructure equipment. However, PVT will test the equipment it procures as soon as it is available, to make sure it meets the manufacturer’s specifications.
- 4) **Release and General Availability to Carriers of Network Infrastructure Software** – See answer to #1, above. We also direct the Commission’s attention to recent TTY status report filed by Sprint PCS, which we understand will be included in the April 2002 report in CC Docket No. 94-102 by ATIS/TTY Forum.

¹ See Third Quarterly TTY Implementation Report of PVT Wireless Limited Partnership, filed October 15, 2001.

- 5) **Availability to Carriers of Full Digital Acceptance Test Units** – Unable to determine a firm date at this time with any manufacturer or vendor.
- 6) **Efforts Toward Achieving Digital Wireless Solution Compatibility with Enhanced TTY** – Dependent on handset vendors for enhanced TTY devices.
- 7) **Carrier Coordination of Testing with PSAP** – PVT will test with the PSAPs in the areas where this service will be deployed. Any coordination with the PSAP will be done on a case-by-case basis.
- 8) **Carrier Testing Activities, Including Field Testing, Consumer and End-to-End Testing, and Other Necessary Tests** – Each of these will be tested once equipment, software availability, deployment, installation, and turn up are completed. We plan to conduct TTY compatibility testing on our UT Starcom systems in accordance with UT Starcom testing procedures.
- 9) **Retail Availability of Necessary Consumer Equipment** – Retail availability of CDMA consumer TTY equipment will be implemented by PVT when compatible handsets are ready for rollout. As mentioned in response to question #2, above, standard consumer TTY equipment is compatible with our UT Starcom systems.
- 10) **Geographic Scope of Network Infrastructure Deployment** – Since our CDMA network has only one switch, as hardware become available, it will be deployed across our whole network. Likewise, as TTY compliant handsets become available we will offer them in all retail locations.